



Application for Licence Amendment

Part V Division 3 of the *Environmental Protection Act 1986*

Licence Number	L8403/2009/3
Licence Holder	City of Wanneroo
File Number	APP-0028625
Premises	<p>Wangara Recycling Facility</p> <p>70 Motivation Drive WANGARA WA 6946</p> <p>Legal description –</p> <p>Part of Lot 9005 on Deposited Plan 73863 and Part of Lot 552 on Deposited Plan 406640</p> <p>As defined by the Premises maps attached to the Revised Licence</p>
Date of Report	8 October 2025
Proposed Decision	Revised licence granted

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1. Decision summary

Licence L8403/2009/3 is held by City of Wanneroo (licence holder) for the Wangara Recycling Facility (the premises), located at 70 Motivation Drive, Wangara.

This amendment report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the operation of the premises. As a result of this assessment, revised licence L8403/2009/3 has been granted.

The revised licence issued as a result of this amendment consolidates and supersedes the existing licence previously granted in relation to the premises. The revised licence has been granted in a new format with existing conditions being transferred, but not reassessed, to the new format.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this amendment report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

2.2 Application summary

On 10 April 2025, the licence holder submitted an application to the department to amend Licence L8403/2009/3 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- a) Remove category 67A: Compost manufacturing and soil blending;
- b) Add category 62: Solid waste depot;
- c) Construct a 6m x 6m shed to support the acceptance and storage of up to 80,000 tonnes per annual period (tpa) of e-waste;
- d) Removal of the groundwater monitoring conditions on the licence;
- e) Amend the premises boundary on the licence to exclude the historical landfill area and include all existing and proposed waste storage areas (see Figure 1); and
- f) Extend the expiry of the licence (currently due to expire December 2025).

Table 1 below outlines the proposed changes to the existing licence categories.

Table 1: Proposed throughput capacity changes

Category	Current throughput capacity	Proposed throughput capacity	Description of proposed amendment
Category 67A: Compost manufacturing and soil blending	50,000 tpa	Nil	Category to be removed from licence. Processing/ composting activities no longer occur at this premises. The premises receives green waste which is sent offsite for processing and composting and is then returned to site for City of Wanneroo residents to collect in bags.
Category 62: Solid waste depot	Nil	90,000 tpa	Category to be added to licence. Given composting activities do not occur on the premises, category 67A will be replaced by category 62 for existing accepted waste types. The quantity of existing accepted waste types (tpa) is below the threshold required for a licence, therefore category 62 was not previously required. Up to 80,000 tpa of e-waste is proposed to be added as an accepted waste type at the premises, triggering the requirement for category 62 on the licence. A 6m x 6m shed will be constructed on an impervious floor for e-waste storage.

2.2.1 Contaminated Sites Act 2003

The premises was formerly a municipal waste landfill known as Badgerup Tip, which ceased receiving putrescible waste in 1991. Inert waste continued to be accepted, and the site was licenced as a Class I inert landfill and compost manufacturing/ blending facility (L7225/1997/1). In 2009, the licence was amended, and the landfill category was removed from the licence.

The licence holder has requested to amend the prescribed premises boundary to exclude the historical landfill area and to remove associated groundwater monitoring conditions.

Lot 9005 on Deposited Plan 73863 was classified as *contaminated – remediation required* under the *Contaminated Sites Act 2003* (CS Act) on 17 June 2021. The classification was based on the site's historical use as a landfill and the findings of historical contamination assessments completed at the site. These included:

- landfill waste (e.g demolition rubble, plastic, wood, steel, cardboard, glass, paper, tyres, concrete and domestic waste) present in soil up to 17 metres in thickness, and located around seven to eight metres above the groundwater table;
- fragments of asbestos-containing material (ACM) present on surface soils;
- appreciable amounts of landfill gases (such as methane, carbon dioxide and hydrogen sulfide) being generated from putrescible landfill material; and
- chloride, ammonia and per- and poly-fluoroalkyl substances (PFAS) present in groundwater beneath the site at concentrations exceeding relevant assessment criteria.

The City of Wanneroo, as the site owner and likely responsible party for the contamination, are still required (under the CS Act) to undertake additional groundwater investigations to delineate the extent of the nutrient and PFAS plume. The purpose of this requirement is to

address the actions required under the CS Act classification



Figure 1: Existing premises boundary (blue) and proposed premises boundary (red)

2.2.2 Additional updates to licence

As part of this amendment package the department has initiated the following updates:

- update to the format and appearance of the licence;
- revised licence condition's numbers, and removed any redundant conditions and realigned condition numbers for numerical consistency;
- deleted the redundant AACR form set out in schedule 2 of the previous licence and advised the licence holder to obtain the form from the department's website; and
- corrected clerical mistakes and unintentional errors.

The obligations of the licence holder have not changed in renewing the licence. The department has not undertaken any additional risk assessment of the premises related to previous licence editions.

3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk assessments* (DWER 2020).

To establish a Risk Event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises construction and operation which have been considered in this amendment report are detailed in

Table 2: Licence Holder controls Table 2 below. Table 2 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

Table 2: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls
Construction			
Dust	Construction of e-waste storage shed, including: - Vehicle movements - Construction	Air/windborne pathway	Nil
Noise			Nil
Operation			
Uncontrolled fire (smoke), potentially from batteries	Storage of e-waste (including lithium batteries)	Air/windborne pathway	Lithium batteries will be stored in cages in the enclosed e-waste shed, comprising three doors for ventilation. Firefighting equipment will be located nearby.
Contaminated stormwater		Seepage to soils and groundwater	E-waste to be stored in a dedicated shed with impervious concrete floor.
Leachate	Historical composting and landfilling activities		Landfilling activities no longer occur at the premises. Mulching and composting no longer occur at the premises.

3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020), the delegated officer has excluded employees, visitors and contractors of the licence holder's from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

Table 3 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental siting* (DWER 2020)).

Table 3: Sensitive human and environmental receptors and distance from prescribed premises

Human receptors	Distance from prescribed premises
Residential Premises	750 m northeast of northern boundary of premises
Commercial/ industrial premises	Commercial/ industrial premises are immediately adjacent to the east, north and south of the premises boundary.
Public recreation reserve	Mary Park - 460 m north of premises boundary
Environmental receptors	Distance from prescribed premises boundary
Groundwater	18 - 28.5 m below ground level (bgl)
Public Drinking Water Source Area (PDWSA)	2 km west
Geomorphic wetlands	Resource enhancement – 2.2 km east Multiple use - 1.2 km east and 1.7 km northeast Conservation – 900 m north, 2 km west, 2.2 km southwest and 2.5 km east
Reserves	Lake Gngangara: Conservation and passive recreation reserve – 2.5 km east
Fauna	Lake Gngangara - 2.5 km east. <ul style="list-style-type: none"> • Birds: Threatened – endangered, Specially Protected – Migratory, Priority • Reptile: Priority • Mammal: Priority

Figure 2 below shows the proximity of the premises to the nearest sensitive receptors (prescribed premises boundary depicted in pink).

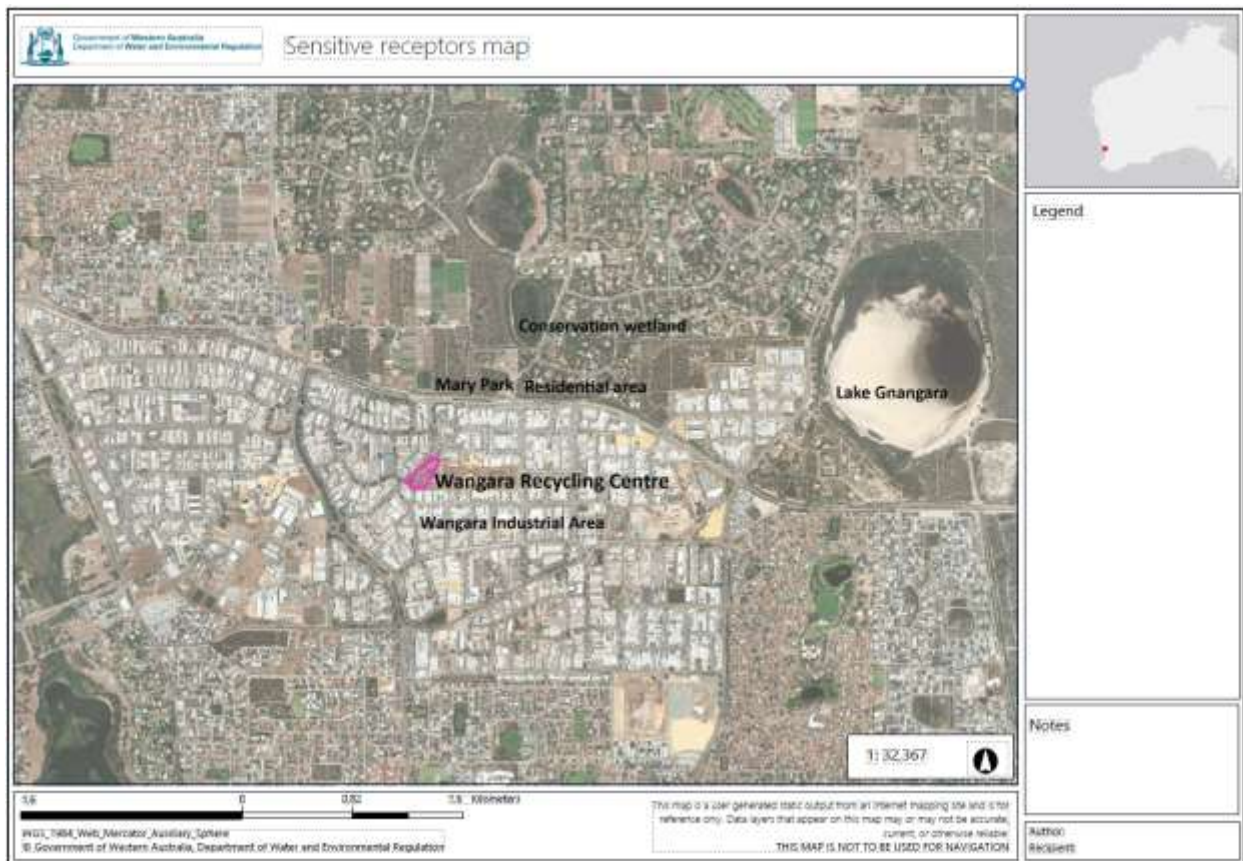


Figure 2: Location of nearby sensitive receptors (premises boundary in pink)

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the licence holder has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the delegated officer considers the licence holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence as regulatory controls.

Additional regulatory controls may be imposed where the licence holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 4.

The revised licence L8403/2009/3 that accompanies this amendment report authorises emissions associated with the operation of the premises.

The conditions in the revised licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Table 4. Risk assessment of potential emissions and discharges from the Premises during construction and operation

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Construction								
Construction of e-waste storage shed - Vehicle movements - Construction	Dust	Air/windborne pathway causing impacts to health and amenity	Residences 750 m northeast of premises	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Yes	N/A	Some additional noise and dust is expected during construction of the e-waste shed, however due to the minor nature of the works, levels are not expected to differ significantly from existing activities at the premises and surrounding industrial area.
	Noise		Commercial premises immediately surrounding the premises	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Yes	N/A	The delegated officer has also considered there is sufficient separation to residential receptors (~750 m) and does not reasonably foresee that noise and dust from these works will impact on these. Therefore, no additional controls will be added to the licence for the construction of the e-waste shed.
Operation								
Receipt, handling and storage of e-waste	Uncontrolled fire (smoke)	Air/windborne pathway causing impacts to health and amenity	Residences 750 m northeast of premises Commercial premises immediately surrounding the premises	Refer to Section 3.1	C = Major L = Possible High Risk	No	<u>Design and construction requirements: Conditions 1 – 4</u> Acceptance, processing and storage requirements: Conditions 5 – 7 <u>Fire and emergency management: Conditions 8 – 12</u> <u>Spills and surface water management: Conditions 13 and 14</u>	Taking into account the licence holder's infrastructure and management controls, Conditions 1, 2, 3 and 4 are added to the licence. Those conditions are to minimise the risk of spills, fire, contaminated storm water and fire water from the storage of e-waste on the premises. Storage of e-waste, particularly lithium batteries, has an inherent fire risk. To mitigate this increase in risk of fire at the premises, the delegated officer has added a condition set (Fire and Emergency Management) to the licence, which includes specification on how firefighting wash water must be managed to prevent discharge to the environment. Additionally, spill management and surface water management conditions are included in the licence. Conditions 5 – 7 have been amended to allow for receipt, handling and storage of e-waste and to establish operational requirements for infrastructure, as well as waste acceptance limits in alignment with the licence holder's proposed controls.
	Firefighting water	Overland runoff and infiltration potentially causing soil and groundwater contamination	In situ soils Threatened or priority fauna and humans who come into contact with contaminated soils	Refer to Section 3.1	C = Moderate L = Possible Medium Risk	No		
	Spills of hazardous waste			Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Yes		
				Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Yes		
Storage of compost and mulch	Contaminated stormwater			Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Yes	Acceptance, processing and storage requirements: Conditions 5 – 7 <u>Surface water management: Condition 14</u>	Conditions 5 – 7 have been amended to allow for receipt, handling and storage of compost and mulch and to establish operational requirements for infrastructure, as well as waste acceptance limits in alignment with the licence holder's proposed controls. Due to the inherent risk of compost and mulch storage generating leachate and contaminating stormwater, condition 14 (surface water management) has been added to the licence.

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk assessments* (DWER 2020).

Note 2: Proposed Licence Holder's controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

4. Assessment of licence holder's request to amend conditions

Historically, the premises would accept green waste to be processed into mulch and compost for resale to the public. This activity had the potential to generate leachate and contaminated stormwater that could negatively impact surrounding land, surface water drainage systems and groundwater. The premises was also formerly a municipal and inert landfill. Leachate and runoff-generating activities onsite (composting and mulching) had the potential to mobilise contaminants in waste historically landfilled at the premises. The previous licence therefore required groundwater monitoring for a range of metals and other contaminants not normally associated with green waste composting.

Given that mulching and composting no longer occurs at the premises, and that the proposed amended premises boundary does not include the historical landfill, the licence holder has requested the groundwater monitoring conditions be removed from the licence.

The delegated officer found that the historical landfill site was classified as *contaminated – remediation required* under the *Contaminated Sites Act 2003* (CS Act) on 17 June 2021, due to findings of historical contamination assessments. Based on this, the City of Wanneroo (the site owner) is still required to undertake groundwater investigations to delineate the extent of the nutrient and per- and polyfluoroalkyl substances (PFAS) plumes. The purpose of this requirement is to address the actions required under the CS Act site classification.

Therefore, the delegated officer considers that groundwater monitoring conditions are not required on the licence. This is due to the following:

- Groundwater monitoring is required under the Contaminated Sites legislation; and
- The historical landfill site is no longer part of the prescribed premises.

5. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

Table 5: Consultation

Consultation method	Comments received	Department response
Licence Holder was provided with draft amendment on 23 September 2025	The licence holder responded on 1 October 2025 and again on 7 October 2025 with information requested in the draft documents. This included the location of putrescible waste storage (including an updated premises map) and confirmation of the production capacity. The licence holder also highlighted some typographical errors in the licence.	The provided information has been added to the licence and this amendment report. The typographical errors have been corrected.

6. Conclusion

Based on the assessment in this Amendment Report, the delegated officer has determined that a revised licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

6.1 Summary of amendments

Table 6 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the amendment process.

Table 6: Consolidation of licence conditions in this amendment

Existing condition	Condition summary	Revised licence condition/s	Conversion notes
N/A	Expiry Date: 23 December 2025	Expiry Date: 05 October 2045	Expiry extended as requested.
N/A	Prescribed Premises Category table – removed category 67A	Prescribed Premises Category table – added category 62	Amended category as requested.
1.1.1 1.1.2	Interpretation and definitions	Interpretation section, Definitions and Table 6	Redundant condition. Revised to current licencing format.
N/A	Infrastructure and equipment	Conditions 1, 2, 3 and Table 1	Condition set added - design and construction requirements of E-waste shed
N/A	Infrastructure and equipment	Condition 4, Table 2	Condition added to be consistent with current licence format.
1.2.1	Waste acceptance	All accepted waste types added to Table 3	Table amended to include all accepted waste types

Existing condition	Condition summary	Revised licence condition/s	Conversion notes
1.2.3 and 1.2.4	Waste processing and storage	Table 4	Table amended to include waste storage and storage requirements
N/A	Fire and emergency management	Conditions 8, 9, 10, 11 and 12	Condition set added
N/A	Spill management	Condition 13	Condition added
N/A	Surface water management	Condition 14	Condition added
2.1.1 2.1.2	Compost monitoring	N/A	Conditions removed
2.2.1	Monitoring of inputs and outputs	Condition 15, Table 5	Table updated to be consistent with current licence format
2.3.1	Groundwater monitoring	N/A	Condition removed
3.1.1	Improvements program	N/A	Removed conditions referencing improvements. Requested documents received by the Department on 29/03/2018
4.1.1	Annual Audit Compliance Report and Complaints recording	Conditions 16 and 19	Updated to be consistent with current DWER licence format
4.2.1 4.2.2	Annual Environmental Report (AER)	N/A	Condition removed
Schedule 1	Premises Map, Site layout and Infrastructure	Schedule 1	Updated the premises map and added site layout map
Schedule 2	Reporting and notification form	N/A	Removed Notification Form N1, to be consistent with current licence format

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.